

WHEREFORE, Plaintiffs respectfully pray passage of an Order by this Honorable Court, declaring:

(a) That, notwithstanding erroneous lot reference in Exhibit C, the Armstrongs own an indefeasible fee simple title to Lots 84 and 85 on the east side of Federal Street in the Town of New Market, as shown by Exhibits D, E and F;

(b) That, as such owners, they own one-half the bed of Federal Street bordering Lot 85, subject only to a five foot public easement therein;

(c) That, as such owners, they own one-half the bed of North Alley bordering Lots 84 and 85 inclusive;

(d) That neither the Town nor any other public body has heretofore accepted the offer of Nicholas Hall to dedicate the above portions of Federal Street and North Alley in accordance with said offer, but the Town has presumptively accepted said offer with respect to Federal Street to the extent of a ten foot wide strip in the center thereof;

(e) That since said dedication has not been accepted, the Armstrongs own an indefeasible fee simple title to the portions of the beds of Federal Street and North Alley occupied by the structure above described, as shown on Exhibit A.

(f) That the Town is without power now or hereafter by acceptance of said dedication to divest, disturb or alien the right and title acquired and owned by the Armstrongs in the beds of Federal Street and North Alley as aforesaid and neither said Town nor any other public agency may so divest said right,